

## **REMARKS**

### **Office Action Not Final**

The Office Action mailed March 7, 2006 was mistakenly marked "Final" on the "Office Action Summary" by the PTO. This Office Action should not be final as it is in response to a RCE filed November 21, 2005. The Examiner confirmed that the 3-7-2006 Office Action is a Non-Final rejection in the Interview Summary of March 29, 2006.

Accordingly, this Amendment should be entered and considered at this time.

### **Allowance of Claims**

Applicants appreciate the Examiner's allowance of Claims 3, 4, 7-18 and 33-62.

Except as explained below, Applicants have amended the claims to clarify the claimed invention and not in response to a patentability rejection. Applicants will now address the Examiner's remaining rejections in the order in which they appear in the Office Action.

### **Claim Rejections - 35 USC §103**

#### **Cok in view of Bell**

In the Office Action, the Examiner rejects Claims 2, 20, 25, 26, 31, 32 and 65 under 35 USC §103(a) as being unpatentable over Cok (US 6,636,191) in view of Bell (US 4,996,523). This rejection is respectfully traversed.

While Applicants traverse this rejection, in order to advance the prosecution of this application, Applicants are amending independent Claims 2 and 20 to recite means for determining a length of a period (e.g. 109 in Fig. 1) in which the light emitting

element emits a light (Claim 2; or the liquid crystal cell is turned on in Claim 20) in accordance with image information of digital video signals stored in each of the n second memories (e.g. 104 in Fig. 1).

Cok does not disclose or suggest a means for determining a length of a period in which the light emitting element emits a light or the liquid crystal cell is turned on.

Bell also does not disclose or suggest this claimed feature. For example, Bell discloses a circuit which is not for determining a length of a period in which the light emitting element emits a light but rather is for determining the brightness level of the emitted light (by current). See e.g. Col. 2, lines 1-13 or col. 3, lines 13-16 (which are sections relied upon by the Examiner) in Bell. Hence, Bell does not disclose the claimed means for determining a length of a period in which the light emitting element emits a light, as in the claimed invention, but is clearly distinguishable from the claimed invention as Bell is only directed to brightness level.

Therefore, even if Cok and Bell were properly combinable (which Applicants do not admit), the combination still fails to disclose or suggest the claimed invention.

Further, the present invention is directed to a light emitting device comprising memories, such as SRAM. In contrast, Cok discloses capacitors (e.g. the Examiner contends that 14 and 92 in Cok are first and second memories but each is a capacitor). Therefore, Cok differs from the present invention and is unrelated to the claimed invention. Hence, it is not proper to combine the capacitors of Cok with the memories of Bell, especially to arrive at the claimed invention which comprises memories.

Furthermore, the present application discloses and claims n first memories (102) and n second memories (104). In contrast, Bell discloses n (first) memories (22n) and

does not disclose or suggest another n (second) memories. Hence, Bell does not disclose or suggest the claimed n first and n second memories. In addition, there would have been no motivation for one skilled in the art to combine the first capacitor and the second capacitor in Cok and the one group n memories in Bell, especially to arrive at the claimed invention.

Additionally, independent Claims 2 and 20 recite the feature of “each bit of n bit digital video signals, which have been written in each of the n first memories, is stored in each of the n second memories.” This feature does not appear to be disclosed or suggested by Cok and/or Bell, even when are combined. In fact, there appears to be no showing or explanation in the Office Action as to where this claimed feature is allegedly disclosed or suggested in the cited references.

Accordingly, independent Claims 2 and 20 and those claimed dependent thereon are not disclosed or suggested by the cited references and are clearly patentable thereover. Therefore, it is respectfully requested that this rejection be withdrawn.

Takeda et al. in view of Bell

The Examiner also rejects Claims 20, 25, and 26 under 35 USC §103(a) as being unpatentable over Takeda et al. (US 4,651,149) in view of Bell. This rejection is also respectfully traversed.

More specifically, with regard to independent Claim 20, the Examiner contends that Takeda discloses all the limitations of this claim except for claimed n memories. The Examiner then alleges that Bell discloses n memories and cures the deficiency in Takeda. Applicants respectfully disagree.

While Applicants traverse this rejection, in order to advance the prosecution of this application, Applicants have amended the claims as discussed above.

Applicants respectfully submit that Takeda does not disclose or suggest the claimed feature of “means for determining a length of a period in which the liquid crystal cell is turned on in accordance with image information of digital video signals stored in each of the n second memories” (emphasis added). While the Examiner generally alleges that Takeda discloses this feature (prior to amendment), Applicants respectfully disagree as it is not seen how Takeda discloses this feature, especially after the amendment. Therefore, it is requested that if the Examiner is going to continue to assert this rejection, that a complete explanation be provided for how Takeda discloses this claimed feature, in particular as amended.

Bell does not disclose this feature for the reasons explained above.

Further, as explained above, the present invention is directed to a light emitting device comprising memories, such as SRAM. In contrast, Takeda discloses capacitors (e.g. the Examiner contends that 23 and 24 in Takeda are first and second memories but each is a capacitor). Therefore, Takeda differs from the present invention and is unrelated to the claimed invention. Hence, it is not proper to combine the capacitors of Takeda with the memories of Bell, especially to arrive at the claimed invention which comprises memories.

Accordingly, independent Claim 20 and those claims dependent thereon are not disclosed or suggested by the cited references and are clearly patentable thereover. Therefore, it is respectfully requested that this rejection be withdrawn.

Legagneux et al. in view of Bell

The Examiner also rejects Claims 2, 31, 32, and 65 under 35 USC §103(a) as being unpatentable over Legagneux et al. (US 6,356,028) in view of Bell. This rejection is also respectfully traversed.

More specifically, with regard to independent Claim 2, the Examiner contends that Legagneux discloses all the limitations of this claim except for claimed n memories. The Examiner then alleges that Bell discloses n memories and cures the deficiency in Legagneux. Applicants respectfully disagree.

While Applicants traverse this rejection, in order to advance the prosecution of this application, Applicants have amended the claims as discussed above.

Applicants respectfully submit that Legagneux does not disclose or suggest the claimed feature of “means for determining a length of a period in which the light emitting element emits a light in accordance with image information of digital video signals stored in each of the n second memories” (emphasis added). While the Examiner generally alleges that Legagneux discloses this feature (prior to amendment), Applicants respectfully disagree as it is not seen how Legagneux discloses this feature, especially after amendment. Therefore, it is respectfully requested that if the Examiner is going to continue to assert this rejection, that a complete explanation be provided for how Legagneux discloses this claimed feature, in particular as amended.

Bell does not disclose this feature for the reasons explained above.

Further, independent Claim 2 is directed to a light emitting device. The Examiner contends that Legagneux discloses a light emitting device. However, Applicants could find no recitation of this feature in the reference, and the Examiner does not identify

where this feature is allegedly disclosed in Legagneux. Instead, Legagneux refers to “cathodic emission devices” and “electron-emission part”. Applicants respectfully submit that the “cathodic emission devices” or “electron-emission part” in Legagneux are different from “the light emitting device” of the present invention. Hence, Legagneux does not disclose or suggest the claimed light emitting device. Therefore, since the purpose of the Legagneux is different from the claimed invention and Bell, it is respectfully submitted that it is not proper to combine Legagneux with Bell, and there would have been no motivation to do so, especially to arrive at the light emitting device of the claimed invention.

Further, as explained above, Bell does not disclose or suggest the claimed  $n$  second memories. Therefore, there would have been no motivation for one skilled in the art to combine the alleged first memory and second memory in Legagneux and the one group  $n$  memories in Bell, especially to arrive at the claimed invention.

Furthermore, it is respectfully submitted that the claimed feature of “each bit of  $n$  bit digital video signals, which have been written in each of the  $n$  first memories, is stored in each of the  $n$  second memories” is not disclosed or suggested by the cited references, even if it were proper to combine Legagneux and Bell (which it is not, as explained above). In addition, there has been no showing in the Office Action as to where this feature is allegedly disclosed in the cited references.

Accordingly, independent Claim 2 and those claims dependent thereon are not disclosed or suggested by the cited references but are patentable thereover. Therefore, it is respectfully requested that this rejection be withdrawn.

Legagneux et al. in view of Bell and Takeda et al.

The Examiner also rejects Claims 20, 25 and 26 under 35 U.S.C. 103(a) as being unpatentable over Legagneux et al. in view of Bell and Takeda et al. This rejection is also respectfully traversed.

With regard to independent Claim 20, the Examiner contends that Legagneux discloses all the limitations of this claim except for claimed n memories and LCD display. The Examiner contends that Bell discloses n memories and cures the deficiency in Legagneux and that Takeda discloses a LCD display also cures the deficiency in Legagneux. Applicants respectfully disagree.

As explained above, in order to advance the prosecution of this application, Applicants have amended independent Claim 20. As explained above, neither Legagneux, Takeda, nor Bell disclose or suggest “means for determining a length of a period in which the liquid crystal cell is turned on in accordance with image information of digital video signals stored in each of the n second memories” (emphasis added).

Further, as explained above, Bell does not disclose n second memories, and it is not proper to combine Legagneux and Bell, especially to arrive at the claimed invention.

Further, independent Claim 20 is directed to a liquid crystal display (LCD). The Examiner cites Takeda as disclosing a LCD display. Takeda, however, does not disclose memories but instead discloses capacitors. Accordingly, it is respectfully submitted that it is not proper to combine Takeda with Legagneux, for the reasons explained above. Further, as explained above, Legagneux discloses “cathodic emission devices” and “electron-emission part.” Legagneux does not disclose a LCD. Therefore, as the purpose of Legagneux is different from the claimed invention and Bell, it is respectfully submitted

that it is not proper to combine these references, especially to arrive at the claimed invention.

Furthermore, it is respectfully submitted that the claimed feature of “each bit of n bit digital video signals, which have been written in each of the n first memories, is stored in each of the n second memories” is not disclosed or suggested by the cited references, even if it were proper to combine Legagneux and Bell (which it is not, as explained above). In addition, there has been no showing in the Office Action as to where this feature is allegedly disclosed in the cited references.

Accordingly, independent Claim 20 and those claims dependent thereon are not disclosed or suggested by the cited references but are patentable thereover. Therefore, it is respectfully requested that this rejection be withdrawn.

#### New Claims

Applicants are also adding new Claims 66-71 in order to further distinguish the present invention from the cited references. Each of these claims is a dependent claim. Therefore, in addition to the features recited in each claim, these claims are also allowable for the reasons discussed above for the independent claims. It is respectfully requested that these new claims be entered and allowed.

If any fee should be due for these new claims, please charge our deposit account 50/1039.



Conclusion

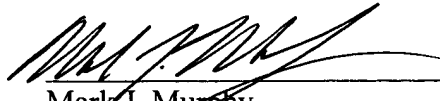
It is respectfully submitted that the present application is in a condition for allowance and should be allowed.

If any fee is due for this amendment, please charge our Deposit Account No. 50-1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

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